

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IVAN SUAZO,

Plaintiff,

-v-

ZOEY MARTINSON, *et al.*,

Defendants.

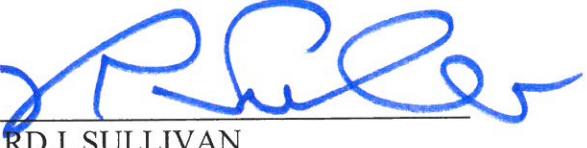
No. 15-cv-4885 (RJS)
ORDER

RICHARD J. SULLIVAN, District Judge:

The Court is now in receipt of the attached emails and exhibits, all dated August 7, 2015, from pro se Defendant Zoey Martinson. In these submissions, Ms. Martinson represents that she does not currently have legal counsel, and requests a second extension of her time to answer the Complaint so that she may secure legal counsel. The Court is also in receipt of a letter from Plaintiff, dated August 7, 2015, questioning whether Defendant does in fact have legal counsel, and opposing Defendant's extension request. IT IS HEREBY ORDERED THAT Defendants Jonathan Martin, Smoke and Mirrors Collaborative, and The Elysabeth Kleinhans Theatrical Foundation shall respond to the attached submissions from Defendant Martinson by August 12, 2015.

SO ORDERED.

Dated: August 10, 2015
New York, New York


RICHARD J. SULLIVAN
UNITED STATES DISTRICT JUDGE



Zoey Martinson
<zoeymartinson@gmail.com>

08/07/2015 03:54 PM

To sullivanNYSDchambers@nysd.uscourts.gov

cc Shana Fried <shana@thefriedfirm.com>

bcc

Subject Re: Civil Action No. 15-04885

1 attachment



martinson letter VLA.pdf

Dear Judge Richard Sullivan,

I have attached a letter from Volunteer Lawyers for the Arts. Leila Amineddoleh and David Galluzzo agreed to assist me through VLA in providing legal advice, but I could not afford to retain them as litigation counsel.

Zoey Martinson
917-903-4809
Co-Artistic Director
Smoke & Mirrors Collaborative

"You must be the change you want to see in the world." -Mahatma Gandhi

On Fri, Aug 7, 2015 at 11:00 AM, Zoey Martinson <zoeymartinson@gmail.com> wrote:

Dear Judge Richard Sullivan,

I, the undersigned, Zoey Martinson, am named as a defendant in the Civil Action identified above.

The court graciously granted me an extension on July 9th, 2015 and I have taken serious steps towards securing counsel, but unfortunately I do not have enough money in my bank account to retain a lawyer. I started working with VLA (Volunteer Lawyers for the Arts) and have completed their intake, interview, and income qualifications. On August 1st, 2015 I was put on their case list and they are working on securing me legal counsel. They advised me to ask for an additional extension from the court so I may find counsel to represent and become familiar with my case. If needed VLA is willing to provide a letter confirming that I am working with them.

Even though I am currently working overseas in areas without electricity and internet. I have taken this case very seriously. I have taken time away from the community centers and HIV/AIDS outreach programs I am working with to drive to areas with more resources to make phone calls and have online interactions in trying to resolve this matter and find legal counsel. And I am grateful to VLA for the amazing work they are doing for artists. I don't feel equipped to answer the summons without counsel because I might fill it out incorrectly having no prior education or experience in law. I would also like to state that I feel as though that fact

has been taken advantage of by Mr. Suazo and his attorney, Shana Fried, Esq. of the The Fried Firm PLLC. Who have sent letters to businesses I am working with along with the press containing false information and actual lies.

Therefore, I respectfully request that the Court extend the time of defendant Zoey Martinson to serve on the plaintiff an answer in this case, until October 1st, 2015. So that I may have time to secure legal representation.

Zoey Martinson
917-903-4809
Co-Artistic Director
Smoke & Mirrors Collaborative

"You must be the change you want to see in the world." -Mahatma Gandhi

UNITED STATES DISTRICT COURT
for the

Southern District of New York

Ivan Sauzo)
)
)
 v.) Civil Action No. 15-04885
)
 Zoey Martinson)
 Jonathan David Martin)
 Smoke and Mirrors Collaborative)
 c/o Zoey Martinson)
 The Elysabeth Kleinhans Theatrical)
 Foundation)

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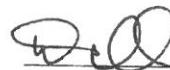
By:



A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

On 7th August, 2015 before me personally appeared Zoey Martinson, personally known to me (or proved to me on the basis of satisfactory evidence) to be the person (s) whose name(s) is/are subscribed to the within instrument, and acknowledged that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

WITNESS my hand and official seal.

 DAVID WELSH
Signature of Notary Public



V L A

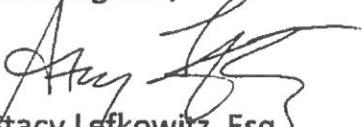
August 7, 2015

Zoey Martinson
339 Lincoln Place #3
Brooklyn, NY 11238

Dear Ms. Martinson,

This letter is to confirm that Volunteer Lawyers for the Arts is actively seeking pro bono counsel to represent you in the matter of *Suazo v. Martinson*. Please be advised, that we have not currently secured pro bono representation and will promptly advise you when and if we find counsel to represent you in this matter.

Kind regards,



Stacy Lefkowitz, Esq.
Director of Legal Services
slefkowitz@vlany.org
(917) 689-8373